

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Revisions to Rules Authorizing the Operation)	WT Docket No. 08-166
of Low Power Auxiliary Stations in the 698-)	
806 MHz Band)	
)	
Public Interest Spectrum Coalition, Petition for)	WT Docket No. 08-167
Rulemaking Regarding Low Power Auxiliary)	
Stations, Including Wireless Microphones, and)	
the Digital Television Transition)	
)	
Amendment of Parts 15, 74 and 90 of the)	WT Docket No. 10-24
Commission's Rules Regarding Low Power)	
Auxiliary Stations, Including Wireless)	
Microphones)	

TO: THE COMMISSION

REPLY COMMENTS OF AMEREN SERVICES COMPANY

Ameren Services Company, by counsel and pursuant to the Commission's *Report and Order and Further Notice of Proposed Rulemaking* (the "*FNPRM*"), hereby respectfully submits these reply comments. The Commission's *FNPRM*, among several items, asks whether the Commission should extend license eligibility under Part 74 of its Rules to nuclear power plants. Ameren supports this initiative, as well as the other permanent solution crafted previously by the Nuclear Energy Institute and Utilities Telecom Council ("NEI/UTC") in WT Docket No. 09-176, either of which could address Ameren's continuing need for the most effective radio equipment at its nuclear facility.

I. Introduction

A. Callaway Plant

Ameren Services Company is the service subsidiary of Ameren Corporation, supporting the operations of four electric utilities: Union Electric Company d/b/a AmerenUE, Central Illinois Light Company d/b/a AmerenCILCO, Illinois Power Company d/b/a AmerenIP, and Central Illinois Public Service Company d/b/a AmerenCILCO (collectively, “Ameren”).¹ Ameren provides electric power service to over 2.4 million customers throughout a 64,000 square mile service territory in Missouri and Illinois. *See* Ameren Fact Sheet.

Twenty percent of AmerenUE’s power is generated by the Callaway Plant, a nuclear power generating station located near Fulton, Missouri. *See* <http://www.ameren.com/callaway>. The Callaway Plant has a generating capacity of 1,190 megawatts and produces sufficient power each year to meet the electricity needs of approximately 780,000 households. *Id.* Ameren is authorized under call sign WE2XHS to operate nine Telex BTR-700/800 base stations and associated equipment at the Callaway Plant.

B. Support of NEI/UTC Previous Request for Rule Waiver

Ameren previously filed comments in WT Docket No. 09-176 in support of the “Request for Waiver to Permit the Use of Two-Way Wireless Headsets and Intercom Devices Inside Nuclear Power Plants,” filed by NEI/UTC on September 23, 2009.² If granted, the waiver would allow nuclear plant operators like Ameren to use Telex

¹ *See* http://www.ameren.com/AboutUs/ADC_AU_FactSheet.pdf (“Ameren Fact Sheet”).

² Comments of Ameren Services Company, WT 09-176 (filed Oct. 26, 2009).

equipment under Part 90 of the Commission's Rules. Ameren impressed upon the Commission the urgency for clarity with regard to this matter because of Ameren's plant refueling scheduled for this April, 2010.³

C. Renewal of WE2XHS

Ameren also filed for a renewal of its experimental license for WE2XHS on December 14, 2009. That renewal application provides Ameren the continuing operating authority to use its license until the application is acted upon by the Commission or the matter is otherwise resolved in this or other relevant proceeding.

II. Ameren Generally Supports the Commission's Part 74 Solution

A. Support for NEI/UTC Comments

Ameren supports the comments filed in this proceeding by NEI/UTC.⁴ Specifically, Ameren agrees that the Commission's proposal to expand eligibility under Part 74 to allow the use of wireless headsets at nuclear power plants would "effectively provide the relief [NEI/UTC] sought in their Petition for Waiver."⁵

As Ameren stated previously in WT Docket No. 09-176, the continued use of Telex headsets is critical to the safe operation of Ameren's Callaway Plant, especially during periods of refueling. Ameren tested numerous other forms of equipment, and determined that "no alternative would provide Ameren a suitable replacement for the Telex equipment" used at the Callaway Plant.⁶ Permanent, authorized use of this equipment provides the best protection to Ameren, its plant, and its workers.

³ *Id.* at 3-5.

⁴ See Comments of the Nuclear Energy Institute and Utilities Telecom Council, WT 08-166, WT 08-167, ET 10-24.

⁵ *Id.* at 3.

⁶ Ameren Comments at 9; see also Declaration of Richard A. Hamilton thereto.

B. 700 MHz Limitations

Ameren understands that the Commission intends to clear the 700 MHz band, and that, even if Part 74 eligibility were provided, it would not include rights to operate (even within the plant) in the 700 MHz band. At present, Ameren operates three base stations and approximately 20 headsets in this band. Ameren estimates that replacement equipment would cost at least \$30,000.00, not including the considerable time to acquire and test the equipment. Ameren notes that, for other plant operators with a higher concentration of 700 MHz equipment, replacement will be a far more expensive, time-consuming and onerous undertaking.

C. The Commission Should Work with Industry to Prepare a Proper Licensing Plan

As stated above, Ameren generally supports the Commission's proposal to allow for licensing under Part 74. Ameren urges the Commission, however, to work with NEI/UTC and others in the industry to craft an appropriate licensing plan that works for all plant operators seeking authority to operate.

III. Conclusion

Ameren's refueling of its Callaway Plant will conclude in May of 2010. As noted, Ameren intends to use Telex equipment during this refueling, and will require the continuing operating authority of WE2XHS through that time. Subsequently, Ameren looks forward to a permanent solution to the Telex issue, including permanent licensing under Part 74.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eric J. Schwalb", written over a horizontal line.

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